



**MEMO ENDORSED**

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April 1, 2022

*VIA ECF*

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007  
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Re: *Syracuse Mountains Corp. v. Petróleos de Venezuela S.A.*, No. 21-cv-2684- VEC

Dear Judge Caproni:

We represent defendant Petróleos de Venezuela, S.A. ("PDVSA") in the above-referenced action. We write to seek leave of the Court to file the Amended Answer attached hereto as Exhibit 1, which adds champerty as an affirmative defense. A redline of the Amended Answer, which reflects the changes from PDVSA's original answer filed on December 1, 2021 [ECF No. 33], is attached hereto as Exhibit 2.

Plaintiff has consented to the filing of the Amended Answer. We request that the Court grant leave to file the Amended Answer. If the Court so requires, PDVSA will submit a formal motion seeking leave to file the Amended Answer.

Respectfully submitted,

/s/ Dennis H. Tracey, III  
Dennis H. Tracey, III  
*Counsel for PDVSA*

Application GRANTED. Defendant must file its Amended Answer not later than April 8, 2022.

SO ORDERED.

Handwritten signature of Valerie Caproni in blue ink.  
4/4/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE